Abstract of the Disclosure:

A portfolio is invested into a multiplicity of investments pool each having different assumed average rates of return. A first pool has an assumed average 5 first rate of return that is the lowest rate of return of all the pools. Distributions are first withdrawn from the first pool, as desired, before withdrawing funds from any of the other pools. At least part of the assets of a second pool which has an assumed second rate of return 10 being the next lowest rate of return are converted into a new pool when the first pool is exhausted. The assets of the new pool are invested in investments having the same assumed average rate of return as the first pool. Therefore, one of the investment pools is designated to 15 have funds withdrawn from it and the other investment pools can be invested for potentially higher rates of return and more tax efficiently.

REL/cgm